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DAVID J. COOPER, CSB NO. 47615
 2 LISA HOLDER, CSB NO. 217752
 3 CONNIE M. PARKER, CSB NO. 254484
 4 KLEIN, DENATALE, GOLDNER,
 COOPER, ROSENLIEB & KIMBALL, LLP
 4550 California Avenue, Second Floor
 Bakersfield, California 93309
 5 Telephone: (661) 395-1000
 Fax: (661) 326-0418
 6 E-mail: lholder@kleinlaw.com

7 Attorneys for Jeffrey Vetter, Chapter 7 Trustee

8 **UNITED STATES BANKRUPTCY COURT**
 9 **EASTERN DISTRICT OF CALIFORNIA**

10 In re:

11 SALMA H. AGHA,

12 Debtor.

Case No. 10-16183-A-7

Chapter 7

DC No. [none identified in moving documents]

13
 14 **DECLARATION OF CONNIE M.**
 15 **PARKER IN SUPPORT OF**
 16 **CHAPTER 7 TRUSTEE JEFFREY**
 17 **VETTER'S OPPOSITION TO**
 18 **DEBTOR'S MOTION TO**
 19 **DISQUALIFY KLEIN, DENATALE,**
 20 **GOLDNER**

21
 22 Date: February 5, 2015
 23 Time: 9:00 a.m.
 24 Place: U.S. Bankruptcy Court
 25 1300 18th Street, Ste. A
 26 Bakersfield, California
 27 Judge: Hon. W. Richard Lee

28 I, CONNIE M. PARKER, declare as follows:

29 1. I am a licensed California attorney and partner with the law firm Klein, DeNatale,
 30 Goldner, Cooper, Rosenlieb & Kimball, LLP ("Klein, DeNatale"). I practice in the area of
 31 bankruptcy and general civil litigation. From my work on this and a related case, I have
 32 personal knowledge of the following:

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KLEIN, DENATALE, GOLDNER,
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 4550 CALIFORNIA AVENUE, SECOND FLOOR
 BAKERSFIELD, CALIFORNIA 93309

1 2. In February 2014, Debtor filed a lawsuit against Honorable Fredrick Clement,
 2 Klein, DeNatale, Chapter 7 Trustee, Jeffrey Vetter (“Trustee”) and others in Los Angeles
 3 County Superior Court. The lawsuit attempts to allege various tort-type theories arising from
 4 the administration of Debtor’s Chapter 7 proceeding.

5 3. The United States Attorneys’ office removed the lawsuit to the United States Court
 6 Central District of California, where the lawsuit remains pending. The case is entitled, *Salma*
 7 *Agha-Khan, M.D. v. United States of America, et. al.*, United States Court, Central District of
 8 California Case No.: CV 14-03490 FMO. I believe the court records, which are voluminous
 9 due to the length of Debtor’s pleadings and number of parties, are accessible via PACER. For
 10 reference purposes, I am submitting a true and correct copy of the first page of Debtor’s
 11 operative complaint, i.e., the second amended complaint, as Exhibit “E.”

12 4. As an attorney with Klein, DeNatale, I am handing Klein, DeNatale’s and Trustee’s
 13 defense in that lawsuit. Trustee waived the conflict-of-interest posed by the dual representation
 14 of Klein, DeNatale and Vetter in that lawsuit. Due to Klein, DeNatale’s background
 15 representing Trustee in the bankruptcy proceeding, Trustee preferred that Klein, DeNatale
 16 continue to represent him in the related lawsuit.

17 5. The lawsuit is pending various motions to dismiss filed by Klein, DeNatale and
 18 other defendants in the case. Klein, DeNatale filed a motion to dismiss the second amended
 19 complaint, without leave to amend, based on *Barton v. Barbour*, 104 U.S. 126 (1881),
 20 amongst other procedural issues.

21 6. Debtor’s disqualification motion is somewhat of a contradiction considering her
 22 prosecution of a lawsuit naming Klein, DeNatale and Trustee. Notwithstanding any
 23 disqualification, Klein, DeNatale would be appearing in Debtor’s related lawsuit, arising from
 24 the administration of Debtor’s Chapter 7 proceeding, as a co-defendant with Trustee.

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1 7. Based on Klein, DeNatale's history representing Trustee since 2012 in the
2 bankruptcy proceeding, and in related the lawsuit thereafter, I believe Trustee would be unduly
3 prejudiced if Klein, DeNatale were disqualified.

4 I declare under penalty of perjury under the laws of the United States of America that
5 the foregoing is true and correct. This declaration is executed on January 22 2015 in Fresno,
6 California.

Connie M. Parker
CONNIE M. PARKER

CONNIE M. PARKER

**KLEIN, DENATALE, GOLDNER,
COOPER, ROSENLEIB & KIMBALL, LLP**
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BAKERSFIELD, CALIFORNIA 93309